

August 2, 2019

VIA ELECTRONIC FILING

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, SC 29210

RE: South Carolina Energy Freedom Act (House Bill 3659) Proceeding Related to Duke Energy Carolinas, LLC and Duke Energy Progress, LLC and S.C. Code Ann. Section 58-41-30 Related to Electrical Utilities and Their Current Voluntary Renewable Energy Program, and Such Other Proceedings Required by the Commission

***Docket Nos: 2019-207-E (Duke Energy Carolinas, LLC)
2019-208-E (Duke Energy Progress, LLC)***

-and-

**Joint Application of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC to Establish Green Source Advantage Programs and Riders GSA
*Docket No. 2018-320-E***

Dear Ms. Boyd,

Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP,” and together with DEC, the “Companies” or “Duke”) are hereby responding to the directive in your letter entered in the above-referenced dockets on June 18, 2019, which requires the Companies to notify the Commission if they have a voluntary renewable energy program “on file” with the Commission as of May 16, 2019, that conforms with the requirements of S.C. Code Ann. Section 58-41-30.

The Companies believe the term “on file” is ambiguous, and could be interpreted to refer to a voluntary renewable energy program that has been filed with the Commission or a voluntary renewable energy program that has been approved by the Commission. On October 10, 2018, in Docket No. 2018-320-E, the Companies filed a proposed voluntary renewable energy program for DEC and DEP, called a “green source advantage” program (“GSA Program”), which is currently

The Honorable Jocelyn G. Boyd
 August 2, 2019
 Page 3

pending before the Commission.¹ The Companies believe the GSA Program filed in Docket No. 2018-320-E conforms with the requirements of S.C. Code Ann. Section 58-41-30. However, given the volume of comments filed by intervenors in that docket on May 17, 2019, the Companies are considering potential amendments to the proposed GSA Program in response to those intervenor comments.² The Companies commit to filing any amendments to the proposed GSA Program by August 30, 2019, and look forward to implementing their GSA Program in a timely manner to assist the Companies' commercial and industrial customers in achieving their renewable energy goals, while at the same time holding non-participating customers financially neutral from the cost of procuring energy under the GSA Program.

Should you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,



Rebecca J. Dulin

cc: Becky Dover, Esq., SC Dept. of Consumer Affairs (*via email*)
 Carri Grube Lybarker, Esq., SC Dept. of Consumer Affairs (*via email*)
 Jeffrey M. Nelson, Esq., Office of Regulatory Staff (*via email*)
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 Frank R. Ellerbe III, Esq., Robinson Gray Stepp & Lafitte, LLC (*via email*)
 Heather Shirley Smith, Esq., Duke Energy (*via email*)

¹ In Order No. 2019-397, issued on May 29, 2019 in Docket No. 2018-320-E, the Commission determined that the Companies should review the programs proposed in that docket to determine whether changes are necessary to conform to the requirements of Act 62. No further action has been taken in that docket since the May 29, 2019 order was issued.

² Any such potential amendments would not modify the program in a manner that would impact its conformity with Act 62.